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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE

JOHN MARGARITIS JR, individually, and
on behalf of all others similarly situated,

Plaintiff,

vs.

AAA OIL, INC. DBA CALIFORNIA
FUELS AND LUBRICANTS, a California
corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case Nos.:

30-2024-01383304-CU-OE-CXC (lead);

30-2024-01416794-CU-OE-CXC

*[Assigned for all purposes to: Hon. Randall J.
Sherman, Dept. CX103]*

DECLARATION OF JAIME DUENAS

1 I, Jaime Duenas, declare as follows:

2 1. I am an owner of AAA Oil, Inc. dba California Fuels and Lubricants
3 ("Defendant"). The facts set forth herein are of my own personal knowledge, and if sworn I could
4 and would competently testify thereto.

5 2. On February 29, 2024, Plaintiff John Margaritis, Jr ("Plaintiff") filed a putative
6 wage and hour class action against Defendant in Orange County Superior Court, Case No. 30-
7 2024-01383304-CU-OE-CXC (the "Class Action"). On August 2, 2024, Plaintiff filed a separate
8 PAGA representative action against Defendant in Orange County Superior Court, Case No. 30-
9 2024-01416794-CU-OE-CXC (the "PAGA Action"). On November 15, 2024, the Class Action
10 and PAGA Action (collectively, the "Actions") were consolidated.

11 3. On October 18, 2024, Plaintiff and Defendant (collectively, the "Parties")
12 participated in a global mediation with neutral Lisa Klerman, Esq., and reached a tentative Class
13 Action and PAGA settlement thereat. The Parties thereafter prepared and finalized a long form
14 Class Action and PAGA Settlement Agreement (the "Agreement"), subject to Court approval.

15 4. On December 2, 2024, I executed the Agreement on behalf of Defendant.

16 5. After making reasonable inquiry, I have not become aware since executing the
17 Agreement of any other class, representative, or other collective action in any court that asserts
18 claims similar to those asserted in these Actions.

19 I declare under penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct and that this declaration was executed on 16th, 2025
21 in the County of Orange, California.

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23 
24 Jaime Duenas
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